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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

No. 3:16 CR 00051 BR

Plaintiff,

MOTION TO PERMIT TRAVEL

vs.

Darryl Thorn,

Defendant.

The defendant, through his attorney Laurie Shertz, moves this Court for an order permitting the defendant to travel to Oregon, from his present release address in Spokane, Washington for the purpose of attending all regularly scheduled hearings, status conferences, and trial in the above captioned case. The defendant will notify his pretrial services officer of the date and time of such hearings, and ensure an appropriate responsible driver assists him in getting to Oregon.

The defendant further moves that he be permitted to stay in a hotel in Portland, at his own expense, the night before any morning hearings (the drive to and from Spokane is approximately six hours), and remain nights in between multi-day hearings.

Respectfully submitted this 12 of May, 2016.

/s/ Laurie Shertz
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United States v. Thorn

USDC Oregon 3:16 CR 00051 BR

Page 1 - MOTION TO PERMIT TRAVEL